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REMARKS

Applicants appreciate the Examiner's thorough consideration provided the present

application. Claims 1-13 are now present in the application. No claims have been amended in

this Reply. Claim 1 is independent. Reconsideration of this application is respectfully

requested.

Information Disclosure Citation

Applicants thank the Examiner for considering the references supplied with the

Information Disclosure Statement filed on April 10, 2007, and for providing Applicants with an

initialed copy of the PTO-1449 form filed therewith.

Drawings

Applicants thank the Examiner for accepting the formal drawings of the instant

application.

Claim Rejections Under 35 U.S.C. § 103

Claims 1-13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Song,

U.S. Patent Application Publication No. US 2002/0135264, in view of Park, U.S. Patent

Application Publication No. US 2002/0105247. This rejection is respectfully traversed.

A complete discussion of the Examiner's rejection is set forth in the Office Action, and is

not being repeated here.

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Previously presented independent claim 1 recites a combination of elements including

"an outer stator having a plurality of radially stacked first lamination sheets around a bobbin in

which a winding coil is wound;" "a terminal part provided at one side of the outer stator for

connecting an external power to the winding coil of the outer stator" and "a magnetic force

balancing part at which the first lamination sheets are not stacked, provided at the outer stator at

the same interval on the basis of the terminal part in a circumferential direction of the outer

stator." Applicants respectfully submit that the combination of elements as set forth in

independent claim 1 is not disclosed or suggested by the references relied on by the Examiner.

The Examiner in the "Response to Arguments" section of the outstanding Office Action

alleged as follows:

Even though the lamination sheets of Park are shown to be parallel, a person of ordinary skill in the art can still apply the lamination sheet free sectors of Park in the reference of Song et al. and still maintain the radial stacking of lamination sheets as shown by Song et al., i.e., a lamination sheet free sector the same shape as the terminal part of Song et al., for the purpose of forming an electromagnetic field between the outer stator and the inner stator that is more

uniform. (Emphasis added.)

Applicants respectfully disagree. As shown in FIGs. 4, 5 and 7 of Park, the lamination-sheet-

free sectors are made by using the core members 61, which are formed by stacking a plurality of

<u>parallel</u> lamination sheets. Without using the <u>parallel</u> lamination sheets, <u>the lamination-sheet-free</u>

sectors will not exist. This is self-explained in Park itself because, as shown in FIG. 2 of Park,

the lamination sheets 11 are radially stacked and therefore cannot provide lamination-sheet-free

sector. By using the core members 61 made of parallel lamination sheets as shown in FIGs. 4, 5

and 7 of Park, the lamination-sheet-free sectors can then be provided between adjacent core

members 61. Therefore, if one skilled in the art applied the lamination-sheet-free sectors of Park

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to Song, Song's lamination sheets would need to be parallel like Park's core members 61 and

cannot maintain the radailly stacked structure. Accordingly, the combination of Song and Park

fails to teach "an outer stator having a plurality of radially stacked first lamination sheets around

a bobbin" as recited in independent claim 1.

In addition, one skilled in the art would not have the motivation to apply Park to Song's

radially stacked lamination sheet structure. In particular, Park in paragraph [0010] states as

follows:

However, according to the above structure, because the plurality of

lamination sheets 11 must be radially stacked to be cylindrical in fabricating the outer core 10 including the winding coil 30, it takes long to stack the lamination

sheets 11... Accordingly, assembly productivity deteriorates. (Emphasis added.)

In other words, Park clearly teaches away from using Song's radially stacked lamination sheets

due to its deteriorated assembly productivity. Therefore, it is improper to combine Song and

Park in the first place, not to mention the fact that the combination of Song and Park still fails to

teach "an outer stator having a plurality of radially stacked first lamination sheets around a

bobbin" as recited in independent claim 1.

Accordingly, neither Song nor Park individually or in combination teaches or suggests

the limitations of independent claim 1. Therefore, Applicants respectfully submit that

independent claim 1 clearly define over the teachings of Song and Park.

In addition, claims 2-13 depend, either directly or indirectly, from independent claim 1,

and are therefore allowable based on their respective dependence from independent claim 1,

which is believed to be allowable.

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In view of the above remarks, Applicants respectfully submit that claims 1-13 clearly

define the present invention over the references relied on by the Examiner. Accordingly,

reconsideration and withdrawal of the rejection under 35 U.S.C. § 103 are respectfully requested.

CONCLUSION

All the stated grounds of rejection have been properly traversed and/or rendered moot.

Applicants therefore respectfully request that the Examiner reconsider all presently pending

rejections and that they be withdrawn.

It is believed that a full and complete response has been made to the Office Action, and

that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to

contact the undersigned at (703) 205-8000 in the Washington, D.C. area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future

replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any

additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Dated: October 5, 2007

Respectfully submitted,

James T.) Eller, Jr.

Registration No.: 39,538

BIRCH, STEWART, KOLASCH & BIRCH, LLP

8110 Gatehouse Road

Suite 100 East

P.O. Box 747

Falls Church, Virginia 22040-0747

(703) 205-8000

Attorney for Applicant

JTE/GH/cl